

STATE OF CONNECTICUT  
DEPARTMENT OF PUBLIC HEALTH  
BUREAU OF HEALTH SYSTEM REGULATION  
DIVISION OF MEDICAL QUALITY ASSURANCE

In re: April Kim Hyatt, L.P.N.  
15 Mott Lane  
Moodus, CT 06469

Petition No. 960119-11-001

STATEMENT OF CHARGES

Pursuant to the provisions of the General Statutes of Connecticut §19a-9 and §19a-14, the Department of Public Health (hereinafter the "Department") brings the following charges against April Kim Hyatt, L.P.N.:

FIRST COUNT

1. April Kim Hyatt, of Moodus, Connecticut (hereinafter "respondent") is and has been at all times referenced in this Statement of Charges, the holder of Connecticut licensed practical nurse license number 023971.
2. On or about January 6, 1996, while employed as a licensed practical nurse at Cobalt Lodge Convalescent Home in Cobalt, Connecticut, respondent:
  - a. substituted Vitamin C for Percocet and/or Plain Tylenol for Tylenol #3 in the "Bingo Cards" of patients A. Labbe, A. Oates, N. Zandrida, P. Toothill, and A. Olander;
  - b. diverted Percocet and Tylenol #3 from patient stock for her own use; and/or
  - c. abused or utilized to excess the controlled substances Percocet and Tylenol #3.
3. The above described facts constitute grounds for disciplinary action pursuant to Connecticut General Statutes Section 20-99(b), including but not limited to:
  - a. 20-99(b) (2);
  - b. 20-99(b) (5); and/or,
  - c. 20-99(b) (6).

SECOND COUNT

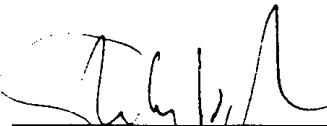
4. Paragraph 1 is incorporated herein by reference as if set forth in full.
5. On or about August 31, 1995, the Connecticut Board of Examiners for Nursing (hereinafter the "Board") issued a Memorandum of Decision in Petition Number 940803-11-036 (hereinafter "the MOD") placing respondent's licensed practical nurse license on probation for a period of four (4) years effective September 1, 1995. Such disciplinary action was based on the following:
  - a. respondent's diversions of narcotics and controlled substances from Middlesex Memorial Hospital, Harbor Hill Care Center, and Cobalt Lodge Convalescent Home between December 1993 and March 1995;

- b. respondent's abuse and/or use to excess of the controlled substance Tylenol with Codeine #3 which she diverted from Harbor Hill Care Center; and,
  - c. respondent's falsification of controlled substance disposition records while employed at Harbor Hill Care Center.
6. Said MOD specifically provided that respondent was not to obtain for personal use and/or use alcohol or any drug unless it was prescribed for her for a legitimate purpose.
7. Respondent had no valid prescription for the Percocet and Tylenol #3 she obtained and/or personally used in January, 1996.
8. Respondent's conduct as described above constitutes violations of the terms of her probation as set forth in the MOD, and subjects respondent to revocation of her nursing license or other disciplinary action authorized by Connecticut General Statutes Section 20-99(b).

THEREFORE, the Department prays that:

The Board of Examiners for Nursing, as authorized in §20-99(a), revoke or take any other action as authorized in §19a-17 against the licensed practical nurse license of April Kim Hyatt as it deems appropriate and consistent with law.

Dated Hartford, Connecticut this 5<sup>th</sup> day of February, 1996



Stanley K. Peuk, Director  
Division of Medical Quality Assurance

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